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**THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS**

Appeal from Horry County
Court of Common Pleas

William H. Seals Jr., Circuit Court Judge

Case No. 2015-CP-26-05573
Appellate Case No. 2018-002009

RECEIVED
OCT 30 2019
SC Court of Appeals

K.A. Diehl and Associates, Inc.,

Respondent,

v.

James Perkins, Colleen Franke a/k/a Colleen Franke Perkins,
Mark Dos Santos, William Moore, Steven Dame
and Errol Dos Santos,

Defendants,

Of whom Mark Dos Santos is the

Appellant.

PETITION TO WITHDRAW AS COUNSEL OF RECORD

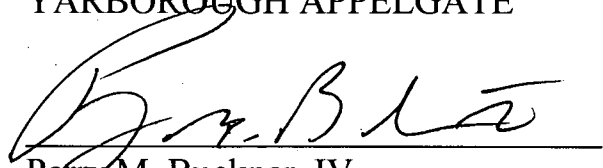
YOUNG CLEMENT RIVERS, LLP
D. Jay Davis Jr. (SC Bar No. 12084)
Russell G. Hines (SC Bar No. 72100)
25 Calhoun Street, Suite 400
Charleston, South Carolina 29401
P.O. Box 993 (29402)
(843) 577-4000

Attorneys for Appellant

Appellant is represented in this matter by Young Clement Rivers, LLP (“YCR”). Among the YCR attorneys who have appeared on behalf of Appellant are Perry M. Buckner, IV, and J. Joseph Owens. Having recently left YCR to practice with other firms, as reflected below, pursuant to Rule 264(b), SCACR, Messrs. Buckner and Owens now petition this Honorable Court to allow their withdrawal as counsel of record for Appellants.

YARBOROUGH APPELGATE

By:



Perry M. Buckner, IV
291 East Bay Street, Floor 2
Charleston, SC 29401
(843) 972-0150

WILLOUGHBY & HOEFER

By:

J. Joseph Owens
133 River Landing Drive, Suite 200
Charleston, SC 29492
(843) 619-4426

D. Jay Davis, Jr., and Russell G. Hines, all of YCR, will remain as counsel of record for Appellants. A copy of this petition is being served upon opposing counsel, and the filing fee is submitted herewith.

[Signature on next page]

Appellant is represented in this matter by Young Clement Rivers, LLP (“YCR”). Among the YCR attorneys who have appeared on behalf of Appellant are Perry M. Buckner, IV, and J. Joseph Owens. Having recently left YCR to practice with other firms, as reflected below, pursuant to Rule 264(b), SCACR, Messrs. Buckner and Owens now petition this Honorable Court to allow their withdrawal as counsel of record for Appellants.

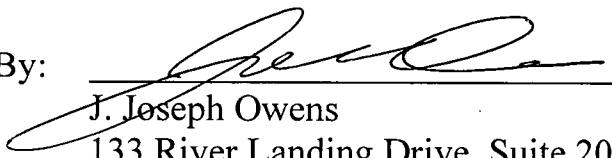
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D. Jay Davis, Jr., and Russell G. Hines, all of YCR, will remain as counsel of record for Appellants. A copy of this petition is being served upon opposing counsel, and the filing fee is submitted herewith.

[Signature on next page]

Appellant is represented in this matter by Young Clement Rivers, LLP (“YCR”). Among the YCR attorneys who have appeared on behalf of Appellant are Perry M. Buckner, IV, and J. Joseph Owens. Having recently left YCR to practice with other firms, as reflected below, pursuant to Rule 264(b), SCACR, Messrs. Buckner and Owens now petition this Honorable Court to allow their withdrawal as counsel of record for Appellants.

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D. Jay Davis, Jr., and Russell G. Hines, all of YCR, will remain as counsel of record for Appellants. A copy of this petition is being served upon opposing counsel, and the filing fee is submitted herewith.

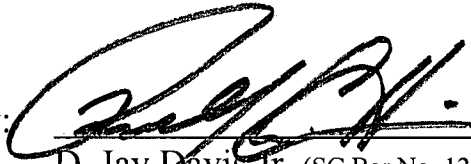
[Signature on next page]

*[Signature page for Petition to Withdraw as Counsel of Record;
Appellate Case No. 2018-002009]*

Respectfully submitted,

YOUNG CLEMENT RIVERS, LLP

By: _____



D. Jay Davis Jr. (SC Bar No. 12084)

Russell G. Hines (SC Bar No. 72100)

25 Calhoun Street, Suite 400

Charleston, South Carolina 29401

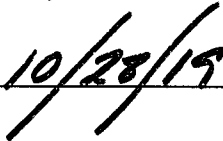
P.O. Box 993 (29402)

(843) 577-4000

Attorneys for Appellant

Charleston, South Carolina

Dated: _____



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Defendants,

Of whom Mark Dos Santos is the

Appellant.

PROOF OF SERVICE

YOUNG CLEMENT RIVERS, LLP
D. Jay Davis Jr. (SC Bar No. 12084)
Russell G. Hines (SC Bar No. 72100)
Perry M. Buckner IV (SC Bar No. 100031)
J. Joseph Owens (SC Bar No. 102794)
25 Calhoun Street, Suite 400
Charleston, South Carolina 29401
P.O. Box 993 (29402)
(843) 577-4000

Attorneys for Appellant

I, Russell G. Hines, of Young Clement Rivers, LLP, attorney for Appellant, hereby certify that the foregoing **PETITION TO WITHDRAW AS COUNSEL OF RECORD** was served on all other parties to this matter by depositing a copy of same in the U.S. Mail on October 28, 2019, properly posted for delivery to the following addressees:

Henrietta U. Golding, Esquire
Alicia E. Thompson, Esquire
Burr & Forman, LLP
P.O. Box 336
Myrtle Beach, SC 29578

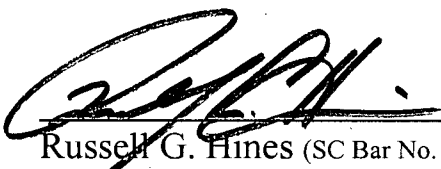
Jackson H. Daniel, III, Esquire
Carlock Copeland & Stair, LLP
40 Calhoun Street, Suite 400
Charleston, SC 29401
Attorney for Mark dos Santos

and

Wm. Grayson Lambert, Esquire
Burr & Forman LLP
P.O. Box 11390
Columbia, SC 29211

*Attorneys for Respondent
K.A. Diehl and Associates, Inc.*

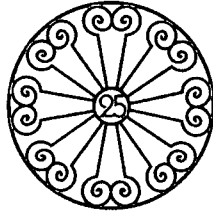
Respectfully submitted,
YOUNG CLEMENT RIVERS, LLP

By: 

Russell G. Hines (SC Bar No. 72100)
Attorneys for Appellant

Charleston, South Carolina

Dated: 10/28/19



YCR LAW

Kathleen B. Barnes
Secretary

Direct Dial: (843) 720-5488
Direct Fax: (843) 579-1369
E-mail: kbarnes@ycrlaw.com

October 28, 2019

Jenny Abbott Kitchings, Clerk of Court
South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

Re: K.A. Diehl and Associates, Inc. v. James Perkins, Colleen Franke, a/k/a Colleen Franke Perkins, Mark Dos Santos, Nancy Moore, William Moore, Steven Dame, and Errol Dos Santos, Of whom Mark Dos Santos is the Appellant
Appellate Case No. 2018-002009
Case No.: 2015-CP-26-05573
Claim No.: 916718
YCR File: 14168-20180194


Dear Ms. Kitchings:

Enclosed please find the original and seven (7) copies of a Petition to Withdraw as Counsel of Record, the original and one (1) copy of the Proof of Service of same and our firm's check in the amount of \$50.00 representing the filing fee. Please file the originals and return court-stamped copies to me in the enclosed envelope.

With best wishes and kindest regards, I am

Sincerely,

YCR LAW, LLP


Kathleen B. Barnes
Secretary

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SC Court of Appeals

Enclosures

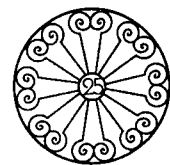
Cc: Henrietta U. Golding, Esquire, Burr & Forman, LLP
Alicia E. Thompson, Esquire, Burr & Forman, LLP
Wm. Grayson Lambert, Esquire, Burr & Forman, LLP
Jackson H. Daniel, III, Esquire, Carlock Copeland & Stair, LLP

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10/28/2019
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FIRST CLASS MAIL



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RGH
14168-20180194

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